

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**ROBERT J. MUELLER, DEEPROOT FUNDS
LLC (a/k/a dprt Funds, LLC), AND POLICY
SERVICES INC.,**

Defendants,

-and-

**DEEPROOT TECH LLC, DEEPROOT
PINBALL LLC, DEEPROOT STUDIOS LLC,
DEEPROOT SPORTS & ENTERTAINMENT
LLC, DEEPROOT RE 12621 SILICON DR LLC,
AND ROBERT J. MUELLER, JEFFREY L.
MUELLER, AND BELINDA G. BREEN, AS CO-
TRUSTEES OF THE MB HALE OHANA
REVOCABLE TRUST,**

Relief Defendants.

Civil Action No.: 5:21-cv-785-XR

**DEFENDANT ROBERT J. MUELLER'S OBJECTIONS TO PLAINTIFF'S
DESIGNATION OF POTENTIAL EXHIBITS**

TO THE HONORABLE COURT:

Pursuant to Fed. R. Civ. P. 26(a)(3) and the Court's Fifth Amended Scheduling Order (ECF No. 102), Defendant Robert J. Mueller submits the following objections to Plaintiff Security and Exchange Commission's (the "**SEC**") Designation of Potential Exhibits:

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-1	575 Fund PPM Sept. 1, 2015	SEC-DEEPROOT-E-0014497 - 12	X		None.
P-2	575 Fund PPM Sept. 1, 2015	SEC-DEEPROOT-E-0164808 - 23	X		Rule 403 – Duplicate of P-1.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-3	575 Fund PPM Sept. 16, 2019	SEC-DEEPROOT-E-0164824 - 41	X		None.
P-4	575 Fund PPM Jan. 1, 2021	SEC-DEEPROOT-E-0211514 - 30	X		None.
P-5	dGRD Fund PPM Aug. 3, 2015	SEC-DEEPROOT-E-0013399 - 416	X		None.
P-6	dGRD Fund PPM Aug. 3, 2015	SEC-DEEPROOT-E-0164786 - 803	X		None.
P-7	dGRD Fund PPM Sept. 12, 2019	SEC-DEEPROOT-E-0164762 - 780	X		None.
P-8	Operating Agreement of 575 Fund, Sept. 1, 2015	MUELLER 001067 - 88	X		None.
P-9	Operating Agreement of 575 Fund, Feb. 26, 2018	DEEPROOT-E-0019790	X		None.
P-10	Operating Agreement of dGRD Fund, Aug. 3, 2015	MUELLER 001045-66	X		None.
P-11	Operating Agreement of dGRD Fund, Feb. 26, 2018	SEC-DEEPROOT-E-0005760	X		None.
P-12	Gray Application and Subscription to 575 Fund	DEEPROOT FUNDS 002274 - 80	X		None.
P-13	Donnelly Application and Subscription to 575 Fund	DEEPROOT FUNDS 001926 - 33	X		None.
P-14	Welcome Letter to Robert & Michelle Kane and attachments Dec. 19, 2017	SEC-KaneR-E-E-0000015-23	X		Rule 801; Rule 901; authenticity.
P-15	Thompson Application and Subscription to 575 Fund	DEEPROOT FUNDS 006943 - 51	X		None.
P-16	deeproot Organizational Charts	DEEPROOT FUNDS 006214 - 6	X		None.
P-17	Investment Allocation Agreement	SEC-DEEPROOT-E-0213963 - 66	X		None.
P-18	Contingent Pledge and Security Agreement	SEC-DEEPROOT-E-0213967 - 79		X	None.
P-19	Expert Report of Bill Post Mar. 17, 2023		X		Hearsay; improper legal opinions that invade the province of the Court; Rule 403; Rule 702.
P-20	Supplemental Expert Report of Bill Post Apr. 27, 2023		X		Hearsay; improper legal opinions that invade the province of the Court; Rule 403; Rule 702.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-21	Order Authorizing and Approving the Sale of Certain Personal Property Free and Clear of All Interests Pursuant to 11 U.S.C. §§ 363(b) and (f), in the matter of <i>In re deeproot Capital Management, LLC</i> (Bkr. No. 21- 51523-MMP), <i>et al.</i> , and <i>In re Policy Services, Inc.</i> (Bkr. No. 21-51513-MMP), in the United States Bankruptcy Court for the Western District of Texas.		X		Rule 403.
P-22	Summary: List of Bank Accounts and Credit Cards		X		Rule 403 – Incomplete.
P-23	Summary: Allowable Spend Compared to Actual Spend		X		Rule 403; Assumes facts not in evidence; lack of foundation.
P-24	Summary: Fractionalized Shares of Policies Sold to Outside Investors		X		Rule 403; Assumes facts not in evidence; lack of foundation; also includes hearsay.
P-25	Summary: Maturity Distribution for Policies with Fractionalized Shares Sold to Prior Investors		X		Rule 403; Assumes facts not in evidence; lack of foundation; also includes hearsay.
P-26	Verma Declaration Oct. 6, 2021			X	Hearsay; Rule 701; lack of foundation; speculation; conclusory; Rule 403.
P-27	Verma Declaration Aug. 17, 2023			X	Hearsay; Rule 701; lack of foundation; speculation; conclusory; Rule 403.
P-28	Complaint, Dkt. 001			X	Hearsay.
P-29	Answer, Dkt. 043			X	Hearsay.
P-30	Mueller Responses and Objections to SEC's First Set of Interrogatories Aug. 19, 2022		X		Mueller objects to the extent that the SEC relies on any answers that included objections as the SEC has not received rulings resolving such objections.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-31	Mueller Responses and Objections to SEC's First and Second Set of Requests for Admissions Dec. 12, 2022		X		Mueller objects to the extent that the SEC relies on any answers that included objections as the SEC has not received rulings resolving such objections.
P-32	Mueller Sworn Accounting	SEC-RJM-E-0000015 - 727	X		None.
P-33	Hulings letter to SEC Apr. 6, 2023			X	None.
P-34	deeproot Pinball Disclosure	DEEPROOT FUNDS 005379 - 83		X	None.
P-35	deeproot Funds Commercial Real Estate Allocation Disclosure	DEEPROOT FUNDS_005384 - 90		X	None.
P-36	deeproot Sports & Entertainment Disclosure	DEEPROOT FUNDS 005391 - 99		X	None.
P-37	Portfolio Overview	DEEPROOT FUNDS 005609 - 12		X	Rule 403.
P-38	Assets Backing Up Investments Apr. 1, 2019	DEEPROOT FUNDS 005625	X		Rule 403.
P-39	As simple as 123	DEEPROOT FUNDS 005627		X	None.
P-40	deeproot Conference Materials - 2 Feb. 20, 2020	DEEPROOT FUNDS 005636 - 37		X	None.
P-41	The deeproot Story	DEEPROOT FUNDS 005639 - 40		X	None.
P-42	2017 Training Webinar	DEEPROOT FUNDS 005641 - 53		X	None.
P-43	Letter to Finders Sept. 12, 2019	DEEPROOT FUNDS 005654 - 55		X	None.
P-44	deeproot Miscellaneous Presentations	DEEPROOT FUNDS 005660 - 707		X	None.
P-45	deeproot Kauai January 2020 Conference Deck Feb. 20, 2020	DEEPROOT FUNDS 005677 - 83		X	None.
P-46	deeproot Strengths & Track Record	DEEPROOT FUNDS 005708		X	None.
P-47	Summer 2017 Updates	DEEPROOT FUNDS 005709 - 12		X	None.
P-48	deeproot Presentation Rev. 2020-CB- 3A	DEEPROOT FUNDS 005713 - 39	X		None.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-49	Mueller email to Concilla and Federico re deeproot GROWTH RUNS DEEP FUND, LLC Jan. 8, 2015	MUELLER 001441 - 1553	X		None.
P-50	Texas Certificate of Filing dGRD Fund Jan. 8, 2015	MUELLER 001530		X	None.
P-51	Mueller email to Concilla and Federico re deeproot 575 FUND, LLC Jan. 8, 2015	MUELLER 001554 - 1664	X		None.
P-52	Texas Certificate of Filing 575 Fund LLC Jan. 8, 2015	MUELLER 001665		X	None.
P-53	Management Discussion and Analysis of Financial Condition Feb. 10, 2015	MUELLER 001774 - 84		X	Rule 403.
P-54	Mueller email to Federico and Concilla re Pinball Update May 12, 2015	MUELLER 002186 -99		X	None.
P-55	Mueller email to Concilla May 20, 2015	MUELLER 002254 - 56		X	None.
P-56	Concilla email to Mueller re deeproot Incentives July 29, 2015	MUELLER 002306 - 09	X		None.
P-57	Mueller email to Concilla re deeproot dGRD fund Aug. 5, 2015	MUELLER 002404		X	None.
P-58	dGRD Fund PPM with tracked changes Aug. 10, 2015	MUELLER 002472 - 90		X	None.
P-59	Mueller email to Concilla re dGRD Aug. 12, 2015	MUELLER 002585 - 89	X		None.
P-60	Concilla email to Mueller re dGRD - PPM Aug. 12, 2015	MUELLER 002649 - 67	X		None.
P-61	Mueller email to Concilla re dGRD Aug. 12, 2015	MUELLER 002688	X		None.
P-62	Mueller email to Concilla re dGRD Aug. 18, 2018	MUELLER 002705 - 06	X		Rule of Optional Completeness; Rule 403.
P-63	Concilla email to Mueller re deeproot Funds Aug. 21, 2019	MUELLER 002715 - 17	X		None.
P-64	Concilla email to Mueller re deeproot Sept. 1, 2015	MUELLER 002813 - 14	X		None.
P-65	Mueller email to Concilla re Investor Presentation Sept. 24, 2015	MUELLER 002815		X	None.
P-66	deeproot Investor Presentation	MUELLER 002816 - 51	X		None.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-67	Concilla email to Mueller re Investor Presentation Sept. 24, 2015	MUELLER 002853	X		None.
P-68	Andrew email to Mueller re Fund Draft July 24, 2015	CYCL001596 - 97		X	None.
P-69	Mueller email to Andrew re Confidential - Policy Valuations Mar. 20, 2017	CYCL003061 - 62		X	None.
P-70	Mueller email to Andrew and Regan re Oct, Nov, Dec Oct. 25, 2017	CYCL003627 - 28		X	None.
P-71	Mueller email to Andrew re report July 5, 2018	CYCL004402 - 11		X	None.
P-72	Andrew email to Mueller re Follow- up Apr. 1, 2018	CYCL006055 - 56		X	None.
P-73	Mueller email to Andrew re deeproot Apr. 5, 2019	CYCL006121 - 22		X	None.
P-74	Regan email to Andrew re Basha Contracts Oct. 9, 2019	CYCL006202 - 46		X	Hearsay.
P-75	Shelly email to Andrew, Regan re Bash Policy Relinquishment Payment Oct. 15, 2019	CYCL006249 - 50		X	Hearsay.
P-76	Mueller email to Richardson re Donnelly June 3, 2020	JR000017 - 22		X	None.
P-77	575 Trifold Brochure	JR000140		X	None.
P-78	Spradlin email to Richardson re deeproot Sept. 5, 2018	JR000249 - 78		X	Rule 403; Hearsay.
P-79	Richardson email to Spradlin re deeproot Sept. 26, 2018	JR000344 - 47		X	Rule 403; Hearsay.
P-80	Spradlin email to Thompson re deeproot Sept. 27, 2018	JR000387 - 389		X	Rule 403; Hearsay.
P-81	Richardson email to Spradlin re DeepRoot Account Mar. 12, 2020	JR000816 - 24		X	Rule 403; Hearsay.
P-82	Lux Catering & Events Invoice	MLE 0141 - 45	X		None.
P-83	Hagan email to Concilla, Federico and Mueller re BonusGrowth 5 Year Fund PPM Feb. 19, 2014	MUELLER-CPM 000035	X		None.
P-84	Concilla email Mueller and Federico re 5 year debenture docs Feb. 20, 2014	MUELLER-CPM 000063 - 88	X		None.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-85	Concilla email to Mueller, Federico, Smith re Reg D and unqualified funds Mar. 18, 2014	MUELLER-CPM 000177 - 79	X		None.
P-86	Concilla email to Mueller re the 575 Jan. 15, 2015	MUELLER-CPM 001402	X		None.
P-87	Mueller email to Concilla and Federico re GRD/575 Internal Fund hypotheticals Jan. 20, 2015	MUELLER-CPM 001405	X		None.
P-88	Federico email to Concilla re Catch up Feb. 5, 2015	MUELLER-CPM 001428 - 76	X		None.
P-89	Mueller email to Concilla re deeproot 3 Year Trending Tech Debenture Fund, LLC filings Mar. 27, 2015	MUELLER-CPM 001545 - 46	X		None.
P-90	Mueller email to Concilla and Federico re 3 year tech fund Apr. 2, 2015	MUELLER-CPM 001547	X		None.
P-91	Mueller email to Concilla and Federico re 3 year tech fund Apr. 7, 2015	MUELLER-CPM 001562 - 63	X		None.
P-92	Mueller email to Concilla re Requested call July 22, 2015	MUELLER-CPM 001703		X	None.
P-93	Mueller email to Concilla and Federico re Term Sheet - Draft v1.1 July 23, 2015	MUELLER-CPM 001706 - 10	X		None.
P-94	Mueller email to Concilla re What's a good time today to conference? Aug. 4, 2015	MUELLER-CPM 001772 - 90	X		None.
P-95	Mueller email to Concilla re Are you OK? Sept. 2, 2015	MUELLER-CPM 002187		X	None.
P-96	Mueller email to Concilla re Catch up Dec. 11, 2015	MUELLER-CPM 002237 - 39	X		None.
P-97	Federico email to Mueller and Concilla re Form D Amendment Filing for the dGRD Aug. 9, 2016	MUELLER-CPM 002351	X		None.
P-98	Spradlin Memo May 27, 2020	MUELLER-CPM 002857 - 58	X		None.
P-99	deeproot Investor Presentation Sept. 24, 2015	MUELLER-CPM 004398 - 432	X		None.
P-100	Trifold Draft with Markup Mar. 10, 2023	MUELLER-CPM 006165 - 69		X	None.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-101	Mueller Background Questionnaire	SEC_RJM-E-0000001 - 14		X	Rule 403.
P-102	Abramson Disengagement Letter July 7, 2016	SEC-AAC-E-0000226	X		None.
P-103	Ownership Transfer Agreement	SEC-AAC-E-0000227 - 40		X	None.
P-104	Slack Message from Scott Allen	SA-14-15	X		None.
P-105	Allen Letter to Mueller Oct. 7, 2020	SEC-AllenS-E-000081	X		None.
P-106	Allen Memorandum to Mueller re Resignation Oct. 7, 2020	SEC-AllenS-E-000079-80	X		Hearsay; Rule 802; Rule 403; improper lay opinion; lack of foundation; calls for a legal conclusion.
P-107	deeproot August Bonus Agreement Sept. 9, 2019	SEC-AllenS-E-000037	X		None.
P-108	Scott Allen Memo May 27, 2020	SEC-AllenS-E-000046-51	X		None.
P-109	Big Picture Discussion List	SEC-AllenS-E-000009-14	X		None.
P-110	Receipt: Americus Diamond Dec. 14, 2018	SEC-AMERICUS-E-0000005	X		None.
P-111	Receipt: Americus Diamond Dec. 15, 2018	SEC-AMERICUS-E-0000012	X		None.
P-112	Cooper email to deeproot re August 22, 2020 Letter Sept. 4, 2020	SEC-DEEPROOT-E-0004997 - 99		X	None.
P-113	Muller letter to 575P Investors Sept. 30, 2020	SEC-DEEPROOT-E-0008354	X		None.
P-114	Quick FAQ	SEC-DEEPROOT-E-0011222	X		None.
P-115	deeproot email re deeproot Pinball Launch Date & Incentive Aug. 27, 2020	SEC-DEEPROOT-E-0013075 - 77	X		None.
P-116	Portfolio Narrative Cover email Mar. 5, 2020	SEC-DEEPROOT-E-0013221	X		None.
P-117	deeproot Family of Companies Investment Portfolio Narrative 2020.B2	SEC-DEEPROOT-E-0013223 - 36	X		None.
P-118	Gibbs Disclosure Dec. 1, 2015	SEC-DEEPROOT-E-0016060		X	None.
P-119	Mueller letter to Kirkman July 9, 2019	SEC-DEEPROOT-E-0017557		X	None.

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P-120	Mueller email to Dandridge re deeproot Funds November Updates Nov. 10, 2020	SEC-DEEPROOT-E-0025419	X		None.
P-121	Fact Right Report, 575 Fund October 15, 2019	SEC-DEEPROOT-E-0031095 - 121		X	Best Evidence is FR1001-1003
P-122	Cary Mueller email to Mueller re proxy Feb. 2, 2017	SEC-DEEPROOT-E-0037279 - 82		X	None.
P-123	the 575 Allocation Acknowledgement	SEC-DEEPROOT-E-0061786 - 87	X		None.
P-124	575 Fund Client Letter Sept. 30, 2020	SEC-DEEPROOT-E-0008354	X		None.
P-125	Mueller email to Andrew re Policies Apr. 2, 2019	SEC-DEEPROOT-E-0088710 - 11	X		None.
P-126	Presentations and Materials Dec. 29, 2020	SEC-DEEPROOT-E-0093397 - 99	X		None.
P-127	Premier Global Corp. Factoring Service Agreement	SEC-DEEPROOT-E-0186463-71		X	Rule 403
P-128	Abramson email to Mueller re PS Inc / deeproot 2015 Jan. 11, 2016	SEC-DEEPROOT-E-0187630 - 32		X	None.
P-129	Abramson email to Mueller re Update / Questions Apr. 5, 2016	SEC-DEEPROOT-E-0209999 - 10003		X	None.
P-130	Abramson email to Mueller re Update / Questions Apr. 5, 2016	SEC-DEEPROOT-E-0210005 - 10		X	None.
P-131	Wik email to Mueller re Updated Files Mar. 20, 2017	SEC-DEEPROOT-E-0210796 - 800	X		None.
P-132	Mueller email to Turner including Presentations and Brochures Apr. 6, 2016	SEC-DEEPROOT-E-0211326 - 52		X	None.
P-133	Mueller email to Wik re Updated Files Mar. 18, 2017	SEC-DEEPROOT-E-0226591		X	None.
P-134	deeproot Simplified Cash Flow Forecast 2017-2022	SEC-DEEPROOT-E-0226592		X	None.
P-135	Policy Valuation Mar. 2017	SEC-DEEPROOT-E-0226593		X	None.
P-136	Mueller email to Regan and Andrew re Updated Presentations June 8, 2017	SEC-DEEPROOT-E-0226740 - 82	X		None.
P-137	Allen email to Mueller re Deeproot Fund 575P Investment of \$133,000 by Andrew W. Cheronas Oct. 6,	SEC-DEEPROOT-E-0126910-13		X	None.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
	2020				
P-138	Disney Payment History	SEC-DISNEY-E-0000177 - 79	X		None.
P-139	Disney Cruise Receipts 2016	SEC-DISNEY-E-0000001 - 27	X		None.
P-140	Disney Cruise Receipts 2017	SEC-DISNEY-E-0000051 - 117	X		None.
P-141	Disney Cruise Receipts 2018	SEC-DISNEY-E-0000118 - 173	X		None.
P-142	deeproot 575 Fund, LLC Operating Agreement	SEC-DonnellyJ-E-0000001 - 21	X		None.
P-143	575 Fund PPM Sept. 1, 2019	SEC-DonnellyJ-E-00000022-37	X		None.
P-144	575 Allocation Modification Disclosure	SEC-DonnellyJ-E-00000038		X	None.
P-145	Donnelly 575 Fund Application & Subscription Agreement	SEC-DonnellyJ-E-00000039-46	X		None.
P-146	deeproot Equity Fund Packet Welcome Sheet	SEC-DonnellyJ-E-00000062-69	X		None.
P-147	Equity Fund Closing Packet	SEC-DonnellyJ-E-00000070 - 112	X		None.
P-148	Sub-Sublease Agreement Mar. 2019	SEC-EMAILS-E-0011648 - 56		X	None.
P-149	Tabora Gallery Receipt Jan. 12, 2017	SEC-EMAILS-E-0016479	X		None.
P-150	Tabora Gallery Invoice and Receipts Jan. 12, 2017	SEC-EMAILS-E-0016515 - 16	X		None.
P-151	Tabora Gallery Receipt Aug. 9, 2018	SEC-EMAILS-E-0016501 - 03	X		None.
P-152	Photo from Tabora Gallery	SEC-EMAILS-E-0016473	X		None.
P-153	SDV October 2020 Statement	SEC-EMAILS-E-0017226		X	None.
P-154	SDV March 2021 Statement	SEC-EMAILS-E-0017232 - 33		X	None.
P-155	SDV Lease	SEC-EMAILS-E-0017234 - 67		X	None.
P-156	Allen Resume	SEC-EMAILS-E-0018789		X	None.
P-157	deeproot Pinball Balance Sheet Dec. 31, 2015	SEC-FTI-E-0000010		X	Lack of foundation; Rule 403.

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P-158	deeproot Pinball Balance Sheet Dec. 31 2016	SEC-FTI-E-0000011		X	Lack of foundation; Rule 403.
P-159	deeproot Pinball Balance Sheet Dec. 31, 2017	SEC-FTI-E-0000012		X	Lack of foundation; Rule 403.
P-160	deeproot Pinball Balance Sheet Dec. 31, 2018	SEC-FTI-E-0000013		X	Lack of foundation; Rule 403.
P-161	deeproot Pinball Balance Sheet Dec. 31, 2019	SEC-FTI-E-0000014		X	Lack of foundation; Rule 403.
P-162	deeproot Pinball Balance Sheet Dec. 31 2020	SEC-FTI-E-0000015		X	Lack of foundation; Rule 403.
P-163	deeproot Pinball Balance Sheet Oct 14, 2021	SEC-FTI-E-0000016		X	Lack of foundation; Rule 403.
P-164	deeproot Pinball General Ledger Sept. 24 - Oct. 14, 2021	SEC-FTI-E-0000017 - 20		X	Lack of foundation; Rule 403.
P-165	deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2016	SEC-FTI-E-0000021		X	Lack of foundation; Rule 403.
P-166	deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2017	SEC-FTI-E-0000022		X	Lack of foundation; Rule 403.
P-167	deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2018	SEC-FTI-E-0000023		X	Lack of foundation; Rule 403.
P-168	deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2019	SEC-FTI-E-0000024		X	Lack of foundation; Rule 403.
P-169	deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2020	SEC-FTI-E-0000025		X	Lack of foundation; Rule 403.
P-170	deeproot Pinball Profit Loss Jan. 1 - Oct. 14, 2021	SEC-FTI-E-0000026		X	Lack of foundation; Rule 403.
P-171	deeproot Pinball Profit Loss Sept. 24 - Dec. 31, 2015	SEC-FTI-E-0000027		X	Lack of foundation; Rule 403.
P-172	deeproot Pinball Trial Balance Dec. 31, 2016	SEC-FTI-E-0000028		X	Lack of foundation; Rule 403.
P-173	deeproot Pinball Trial Balance Dec. 31, 2017	SEC-FTI-E-0000029		X	Lack of foundation; Rule 403.
P-174	deeproot Pinball Trial Balance Dec. 31, 2018	SEC-FTI-E-0000030		X	Lack of foundation; Rule 403.
P-175	deeproot Pinball Trial Balance Dec. 31, 2019	SEC-FTI-E-0000031		X	Lack of foundation; Rule 403.
P-176	deeproot Pinball Trial Balance Dec. 31, 2020	SEC-FTI-E-0000032		X	Lack of foundation; Rule 403.
P-177	deeproot Pinball Trial Balance Oct. 14, 2021	SEC-FTI-E-0000033		X	Lack of foundation; Rule 403.
P-178	deeproot Pinball Trial Balance Sept. 24 - Dec. 31, 2015	SEC-FTI-E-0000034		X	Lack of foundation; Rule 403.

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P-179	deeproot Funds Balance Sheet Dec. 31, 2018	SEC-FTI-E-0000052 - 55		X	Lack of foundation; Rule 403.
P-180	deeproot Funds Balance Sheet Dec. 31, 2015	SEC-FTI-E-0000044 - 45		X	Lack of foundation; Rule 403.
P-181	deeproot Funds Balance Sheet Dec. 31, 2016	SEC-FTI-E-0000046 - 48		X	Lack of foundation; Rule 403.
P-182	deeproot Funds Balance Sheet Dec. 31, 2017	SEC-FTI-E-0000049 - 51		X	Lack of foundation; Rule 403.
P-183	deeproot Funds Balance Sheet Dec. 31, 2019	SEC-FTI-E-0000056 - 61		X	Lack of foundation; Rule 403.
P-184	deeproot Funds Balance Sheet Dec. 31, 2020	SEC-FTI-E-0000062 - 67		X	Lack of foundation; Rule 403.
P-185	deeproot Funds Balance Sheet Oct. 14, 2021	SEC-FTI-E-0000068 - 73		X	Lack of foundation; Rule 403.
P-186	deeproot Funds Balance Sheet Oct. 14, 2021	SEC-FTI-E-0000074 - 182		X	Lack of foundation; Rule 403.
P-187	deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2016	SEC-FTI-E-0000183		X	Lack of foundation; Rule 403.
P-188	deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2017	SEC-FTI-E-0000184		X	Lack of foundation; Rule 403.
P-189	deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2018	SEC-FTI-E-0000185		X	Lack of foundation; Rule 403.
P-190	deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2019	SEC-FTI-E-0000186		X	Lack of foundation; Rule 403.
P-191	deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2020	SEC-FTI-E-0000187		X	Lack of foundation; Rule 403.
P-192	deeproot Funds Profit Loss Jan. 1 2021 - Oct. 14, 2021	SEC-FTI-E-0000188		X	Lack of foundation; Rule 403.
P-193	deeproot Funds Profit Loss Sept. 24 2015 - Oct. 14, 2021	SEC-FTI-E-0000189		X	Lack of foundation; Rule 403.
P-194	deeproot Funds Trial Balance Dec. 31, 2015	SEC-FTI-E-0000190		X	Lack of foundation; Rule 403.
P-195	deeproot Funds Trial Balance Dec. 31, 2016	SEC-FTI-E-0000191 - 92		X	Lack of foundation; Rule 403.
P-196	deeproot Funds Trial Balance Dec. 31, 2017	SEC-FTI-E-0000193 - 95		X	Lack of foundation; Rule 403.
P-197	deeproot Funds Trial Balance Dec. 31, 2018	SEC-FTI-E-0000196 - 99		X	Lack of foundation; Rule 403.
P-198	deeproot Funds Trial Balance Dec. 31, 2019	SEC-FTI-E-0000200 - 05		X	Lack of foundation; Rule 403.
P-199	deeproot Funds Trial Balance Dec. 31, 2020	SEC-FTI-E-0000206 - 11		X	Lack of foundation; Rule 403.
P-200	deeproot Funds Trial Balance Oct. 14, 2021	SEC-FTI-E-0000212 - 17		X	Lack of foundation; Rule 403.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-201	deeproot Studios Balance Sheet Dec. 31 2015	SEC-FTI-E-0000218		X	Lack of foundation; Rule 403.
P-202	deeproot Studios Balance Sheet Dec. 31, 2016	SEC-FTI-E-0000219		X	Lack of foundation; Rule 403.
P-203	deeproot Studios Balance Sheet Dec. 31, 2017	SEC-FTI-E-0000220		X	Lack of foundation; Rule 403.
P-204	deeproot Studios Balance Sheet Dec. 31, 2018	SEC-FTI-E-0000221		X	Lack of foundation; Rule 403.
P-205	deeproot Studios Balance Sheet Dec. 31, 2019	SEC-FTI-E-0000222		X	Lack of foundation; Rule 403.
P-206	deeproot Studios Balance Sheet Dec. 31, 2020	SEC-FTI-E-0000223		X	Lack of foundation; Rule 403.
P-207	deeproot Studios Balance Sheet Oct. 14, 2021	SEC-FTI-E-0000224		X	Lack of foundation; Rule 403.
P-208	deeproot Studios General Ledger Sept. 24 2015 - Oct. 14, 2021	SEC-FTI-E-0000225 - 34		X	Lack of foundation; Rule 403.
P-209	deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2016	SEC-FTI-E-0000235		X	Lack of foundation; Rule 403.
P-210	deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2017	SEC-FTI-E-0000236		X	Lack of foundation; Rule 403.
P-211	deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2018	SEC-FTI-E-0000237		X	Lack of foundation; Rule 403.
P-212	deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2019	SEC-FTI-E-0000238		X	Lack of foundation; Rule 403.
P-213	deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2020	SEC-FTI-E-0000239		X	Lack of foundation; Rule 403.
P-214	deeproot Studios Profit Loss Jan. 1 - Oct. 14, 2021	SEC-FTI-E-0000240		X	Lack of foundation; Rule 403.
P-215	deeproot Studios Profit Loss Sept. 24 2015 - Oct. 14, 2021	SEC-FTI-E-0000241		X	Lack of foundation; Rule 403.
P-216	deeproot Studios Trial Balance Dec. 31, 2016.	SEC-FTI-E-0000242		X	Lack of foundation; Rule 403.
P-217	deeproot Studios Trial Balance Dec. 31 2017	SEC-FTI-E-0000243		X	Lack of foundation; Rule 403.
P-218	deeproot Studios Trial Balance Dec. 31, 2018	SEC-FTI-E-0000244		X	Lack of foundation; Rule 403.
P-219	deeproot Studios Trial Balance Dec. 31, 2019	SEC-FTI-E-0000245		X	Lack of foundation; Rule 403.
P-220	deeproot Studios Trial Balance Dec. 31, 2020	SEC-FTI-E-0000246		X	Lack of foundation; Rule 403.
P-221	deeproot Studios Trial Balance Oct. 14, 2021	SEC-FTI-E-0000247		X	Lack of foundation; Rule 403.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-222	deeproot Studios Trial Balance Sept. 24, 2015 - Dec. 31, 2015	SEC-FTI-E-0000248		X	Lack of foundation; Rule 403.
P-223	Deeproot Tech Balance Sheet Dec. 31, 2015	SEC-FTI-E-0000249		X	Lack of foundation; Rule 403.
P-224	Deeproot Tech Balance Sheet Dec. 31, 2016	SEC-FTI-E-0000250		X	Lack of foundation; Rule 403.
P-225	Deeproot Tech Balance Sheet Dec. 31, 2017	SEC-FTI-E-0000251		X	Lack of foundation; Rule 403.
P-226	Deeproot Tech Balance Sheet Dec. 31, 2018	SEC-FTI-E-0000252		X	Lack of foundation; Rule 403.
P-227	Deeproot Tech Balance Sheet Dec. 31, 2019	SEC-FTI-E-0000253		X	Lack of foundation; Rule 403.
P-228	Deeproot Tech Balance Sheet Dec. 31, 2020	SEC-FTI-E-0000254		X	Lack of foundation; Rule 403.
P-229	Deeproot Tech Balance Sheet Oct. 14, 2021	SEC-FTI-E-0000255		X	Lack of foundation; Rule 403.
P-230	deeproot Tech LLC - General Ledger Sept 24, 2015 – Oct. 14, 2021	SEC-FTI-E-0000256 - 362		X	Lack of foundation; Rule 403.
P-231	Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2016	SEC-FTI-E-0000363		X	Lack of foundation; Rule 403.
P-232	Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2017	SEC-FTI-E-0000364		X	Lack of foundation; Rule 403.
P-233	Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2018	SEC-FTI-E-0000365		X	Lack of foundation; Rule 403.
P-234	Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2019	SEC-FTI-E-0000366		X	Lack of foundation; Rule 403.
P-235	Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2020	SEC-FTI-E-0000367		X	Lack of foundation; Rule 403.
P-236	Deeproot Tech Profit Loss Jan. 1 - Oct. 14, 2021	SEC-FTI-E-0000368		X	Lack of foundation; Rule 403.
P-237	Deeproot Tech Profit Loss Sept. 24 - Dec. 31, 2015	SEC-FTI-E-0000369		X	Lack of foundation; Rule 403.
P-238	Deeproot Tech Trial Balance Dec. 31, 2016	SEC-FTI-E-0000370		X	Lack of foundation; Rule 403.
P-239	deeproot Tech Trial Balance Dec. 31, 2017	SEC-FTI-E-0000371		X	Lack of foundation; Rule 403.
P-240	deeproot Tech Trial Balance Dec. 31, 2018	SEC-FTI-E-0000372		X	Lack of foundation; Rule 403.
P-241	deeproot Tech Trial Balance Dec. 31, 2019	SEC-FTI-E-0000373		X	Lack of foundation; Rule 403.
P-242	deeproot Tech Trial Balance Dec. 31, 2020	SEC-FTI-E-0000374		X	Lack of foundation; Rule 403.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-243	deeproot Tech Trial Balance Oct. 14, 2021	SEC-FTI-E-0000375		X	Lack of foundation; Rule 403.
P-244	Policy Services Balance Sheet Dec. 31, 2015	SEC-FTI-E-0000385 - 90		X	Lack of foundation; Rule 403.
P-245	Policy Services Balance Sheet Dec. 31, 2016	SEC-FTI-E-0000391 - 96		X	Lack of foundation; Rule 403.
P-246	Policy Services Balance Sheet Dec. 31, 2017	SEC-FTI-E-0000397 - 401		X	Lack of foundation; Rule 403.
P-247	Policy Services Balance Sheet Dec. 31, 2018	SEC-FTI-E-0000402 - 06		X	Lack of foundation; Rule 403.
P-248	Policy Services Balance Sheet Dec. 31, 2019	SEC-FTI-E-0000407 - 11		X	Lack of foundation; Rule 403.
P-249	Policy Services Balance Sheet Dec. 31, 2020	SEC-FTI-E-0000412 - 16		X	Lack of foundation; Rule 403.
P-250	Policy Services Balance Sheet Oct. 14, 2021	SEC-FTI-E-0000417 - 21		X	Lack of foundation; Rule 403.
P-251	Policy Services General Ledger Sept. 24, 2015 - Oct. 14, 2021	SEC-FTI-E-0000422 - 535		X	Lack of foundation; Rule 403.
P-252	Policy Services Profit Loss Jan. 1 - Dec. 31, 2016	SEC-FTI-E-0000536 - 37		X	Lack of foundation; Rule 403.
P-253	Policy Services Profit Loss Jan. 1 - Dec. 31, 2017	SEC-FTI-E-0000538 - 39		X	Lack of foundation; Rule 403.
P-254	Policy Services Profit Loss Jan. 1 - Dec. 31, 2018	SEC-FTI-E-0000540 - 41		X	Lack of foundation; Rule 403.
P-255	Policy Services Profit Loss Jan. 1 - Dec. 31, 2019	SEC-FTI-E-0000542		X	Lack of foundation; Rule 403.
P-256	Policy Services Profit Loss Jan. 1 - Dec. 31, 2020	SEC-FTI-E-0000543		X	Lack of foundation; Rule 403.
P-257	Policy Services Profit Loss Jan. 1 - Oct. 14, 2021	SEC-FTI-E-0000544		X	Lack of foundation; Rule 403.
P-258	Policy Services Profit Loss Sept. 24 2015 - Dec. 31, 2015	SEC-FTI-E-0000545		X	Lack of foundation; Rule 403.
P-259	Policy Services Trial Balance Dec. 31, 2016	SEC-FTI-E-0000546 - 50		X	Lack of foundation; Rule 403.
P-260	Policy Services Trial Balance Dec. 31, 2017	SEC-FTI-E-0000551 - 55		X	Lack of foundation; Rule 403.
P-261	Policy Services Trial Balance Dec. 31, 2018	SEC-FTI-E-0000556 - 60		X	Lack of foundation; Rule 403.
P-262	Policy Services Trial Balance Dec. 31, 2019	SEC-FTI-E-0000561 - 65		X	Lack of foundation; Rule 403.
P-263	Policy Services Trial Balance Dec. 31, 2020	SEC-FTI-E-0000566 - 70		X	Lack of foundation; Rule 403.
P-264	Policy Services Trial Balance Jan. 1 - Oct. 14, 2021	SEC-FTI-E-0000571 - 74		X	Lack of foundation; Rule 403.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-265	Policy Services Trial Balance Sept. 14 - Dec. 31, 2015	SEC-FTI-E-0000575 - 78		X	Lack of foundation; Rule 403.
P-266	Kauai Vacation Rental Declaration	SEC-KVRRE-E-0000013		X	None.
P-267	Kauai Vacation Rental Owner Statement June 30, 2017	SEC-KVRRE-E-0000014 - 15	X		None.
P-268	Mueller Wire Receipt re 4330 Kauai Beach Dr. Nov. 14, 2016	SEC-ORTC-E-0000361 - 62		X	None.
P-269	Mueller Wire Receipt re 4330 Kauai Beach Dr. Nov. 15, 2016	SEC-ORTC-E-0000363 - 64	X		None.
P-270	Mueller Wire Receipt re 4330 Kauai Beach Dr. Nov. 2, 2016	SEC-ORTC-E-0000365 - 66		X	None.
P-271	Final Settlement Statement Nov. 28, 2016	SEC-ORTC-E-0000410	X		None.
P-272	Concilla email to Mueller attaching engagement letter Apr. 22, 2013	SEC-PulmanR-E-0000001 - 3	X		None.
P-273	Concilla email to Mueller re Followup to Conference Call Apr. 22, 2013	SEC-PulmanR-E-0000013 - 17	X		None.
P-274	Life Settlement Certificates	SEC-PulmanR-E-0000245 - 1038		X	None.
P-275	Life Settlement Certificate, TX120034, Aug 9, 2012	SEC-PulmanR-E-0000819 - 22	X		None.
P-276	Life Settlement Certificate, CA120009, Oct. 1, 2014	SEC-PulmanR-E-0000868 - 77	X		None.
P-277	AMEX Cancellation Letter to Mueller June 2, 2019	SEC-RFPA-AMEX-E-0001731		X	Rule 403.
P-278	x32003 AMEX Statement July 16, 2019	SEC-RFPA-AMEX-E-0002620 - 27		X	Rule 403.
P-279	x41003 AMEX Statement July 19, 2019	SEC-RFPA-AMEX-E-0002067 - 69		X	Rule 403.
P-280	x51001 AMEX Statement July 9, 2017	SEC-RFPA-AMEX-E-0003373 - 75		X	None.
P-281	Amex Statement x51001 May 9, 2016	SEC-RFPA-AMEX-E-0002851 - 57	X		None.
P-282	Amex Statement x51001 Aug. 9, 2016	SEC-RFPA-AMEX-E-0002927 - 49	X		None.
P-283	Amex Statement x51001 Mar. 9, 2017	SEC-RFPA-AMEX-E-0003067 - 79	X		None.
P-284	Amex Statement x51001 Apr. 17, 2017	SEC-RFPA-AMEX-E-0003081 - 89	X		None.
P-285	Amex Statement x51001 July 9,	SEC-RFPA-AMEX-E-	X		None.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
	2018	0003255 - 62			
P-286	Amex Statement x51001 Apr. 8, 2019	SEC-RFPA-AMEX-E-0003351 - 59	X		None.
P-287	x51001 Amex Statements	SEC-RFPA-AMEX-E-0002631 - 3375		X	None.
P-288	x51001 Amex Payments	SEC-RFPA-AMEX-E-0001618 - 19		X	None.
P-289	Amex Statement x51001 Mar. 9, 2016	SEC-RFPA-AMEX-E-0002809 - 29	X		None.
P-290	x2385 Wells Fargo Wire Full Transaction Report Aug. 14, 2019	SEC-RFPA-WFB-E-0005707	X		None.
P-291	x2385 Wells Fargo Wire Full Transaction Report Oct. 2, 2019	SEC-RFPA-WFB-E-0005736	X		None.
P-292	x2385 Wells Fargo Statements May to July 2020	SEC-RFPA-WFP-E-0003761 - 4046		X	None.
P-293	x2385 Wells Fargo Statements May 2020 to Feb. 2021	SEC-RFPA-WFP-E-0004610 - 35		X	None.
P-294	x2385 Wells Fargo Statements June to Aug. 2021	SEC-DEEPROOT-E-0231718 - 24, 30-34		X	None.
P-295	x2385 Wells Fargo Deposits May 2015 to July 2020	SEC-RFPA-WFP-E-0003616 - 745		X	None.
P-296	x2385 Wells Fargo Deposits July 2020 to Feb. 2021	SEC-RFPA-WFB-E-0004559 - 69		X	None.
P-297	x2385 Wells Fargo Wires Jan. 2014 to May 7, 2021	SEC-RFPA-WFB-E-0005387 - 914		X	None.
P-298	x2534 Wells Fargo Muller Withdrawal Slip for \$100k Aug. 10, 2017	SEC-RFPA-WFB-E-0003535	X		Rule 403.
P-299	x2534 Wells Fargo deeproot Funds Check 2356 to Kauai Vacation Rentals Mar. 3, 2017	SEC-RFPA-WFB-E-0003542	X		None.
P-300	x2534 Wells Fargo Statements Apr. 15, 2015 to July 13, 2020	SEC-RFPA-WFB-E-0004047 - 275		X	None.
P-301	x2534 Wells Fargo Statements July 13, 2020 to Mar. 11, 2021	SEC-RFPA-WFB-E-0005226 - 261		X	None.
P-302	x2534 Wells Fargo Statements May 2021 to Aug. 2021	SEC-CORR-E-0000318 - 297		X	None.
P-303	x2534 Wells Fargo Check Nov. 2020	SEC-RFPA-WFB-E-0005184		X	None.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-304	x2534 Wells Fargo Deposits May 2015 to July 2020	SEC-RFPA-WFB-E-0003746 - 49		X	None.
P-305	x2534 Wells Fargo Checks/Debits May 2015 to July 2020	SEC-RFPA-WFB-E-0003495 - 615		X	None.
P-306	x2534 Wells Fargo Wire May 19, 2014	SEC-RFPA-WFB-E-0005915		X	None.
P-307	x2385 and x2534 Wells Fargo Signature Cards	SEC-RFPA-WFB-E-0003754 - 60		X	None.
P-308	x3081 Wells Fargo Wires	SEC-RFPA-WFB-E-0005916 - 19		X	None.
P-309	x3081 x3099 Wells Fargo Signature Card	SEC-RFPA-WFB-E-0001944 - 1948		X	None.
P-310	x3081 Wells Fargo Statements May 2015 to July 2020	SEC-RFPA-WFB-E-0002175 - 2405		X	None.
P-311	x3081 Wells Fargo Statements May 2021 to Aug. 2021	SEC-CORR-E-0000212 -15, 326-29, 205 - 08		X	None.
P-312	x3081 Wells Fargo Statements July 2020 to Jan. 2021	SEC-RFPA-WFB-E-0004636 - 65		X	None.
P-313	x3081 Wells Fargo Deposits July 2020 to Feb. 2021	SEC-RFPA-WFB-E-0004570 - 75		X	None.
P-314	x3099 Wells Fargo Statements May 2021 to Aug. 2021	SEC-CORR-E-0000334 - 354		X	None.
P-315	x5571 Wells Fargo Sig Card	SEC-RFPA-WFB-E-0004580 - 83		X	None.
P-316	x5571 Wells Fargo Statements Feb. 2019 to Feb. 2021	SEC-RFPA-WFB-E-0005262 - 5365		X	None.
P-317	x5571 Wells Fargo Statements May 2015 to Feb. 2021	SEC-RFPA-WFB-E-0004697 - 4951		X	None.
P-318	x5571 Wells Fargo Statements May 2021 to Aug. 2021	SEC-CORR-E-0000270 - 73, 302 - 05, 245 - 249		X	None.
P-319	x5571 Wells Fargo Wires	SEC-RFPA-WFB-E-0005173 - 75		X	None.
P-320	x5571 Wells Fargo Wires	SEC-RFPA-WFB-E-0005924 - 28		X	None.
P-321	x6415 Wells Fargo Signature Card	SEC-RFPA-WFB-E-0005222 - 25		X	None.
P-322	x6415 Wells Fargo Statements May 2021 to Aug. 2021	SEC-DEEPROOT-E-0231746 - 49, 42 - 45, 37		X	None.
P-323	x6575 Wells Fargo Sig Card	SEC-RFPA-WFB-E-0001963 - 66		X	None.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-324	x6575 Wells Fargo Statements Mar. 2017 to July 2020	SEC-RFPA-WFB-E-0002629 - 2807		X	None.
P-325	x6575 Wells Fargo Statements May 2021 to Aug. 2021	SEC-DEEPROOT-E-0231738 - 41, 13 - 17, 25 - 28, 36		X	None.
P-326	x6575 Wells Fargo Checks May 2017 to July 2020	SEC-RFPA-WFB-E-0001536 -650		X	None.
P-327	x6575 Wells Fargo Checks July 2020 to Feb. 2021	SEC-RFPA-WFB-E-0004521 - 30		X	None.
P-328	x6575 Wells Fargo Deposits Mar. 2017 to July 2020	SEC-RFPA-WFB-E-0001847 - 60		X	None.
P-329	x6575 Wells Fargo Wires	SEC-RFPA-WFB-E-0005929 - 5960		X	None.
P-330	x8461 x8487 Wells Fargo Signature Card	SEC-RFPA-WFB-E-0001938 - 1943		X	None.
P-331	x8461 Wells Fargo Statements May 2015 to July 2020	SEC-RFPA-WFB-E-0002808 - 3094		X	None.
P-332	x8461 Wells Fargo Statements May 2021 to Aug. 2021	SEC-RFPA-WFB-E-0231755 - 59, 50 - 53, 35		X	None.
P-333	x8461 Wells Fargo Checks May 2015 to July 2020	SEC-RFPA-WFB-E-0001651 - 1828		X	None.
P-334	x8461 Wells Fargo Checks July 2020 to Feb. 2021	SEC-RFPA-WFB-E-0004531 - 4558		X	None.
P-335	x8461 Wells Fargo Deposits May 2015 to July 2020	SEC-RFPA-WFB-E-0001861 - 1927		X	None.
P-336	x8461 Wells Fargo Wires	SEC-RFPA-WFB-E-0005961 - 64		X	None.
P-337	x8487 Wells Fargo Wire Full Transaction Report Nov. 15, 2016	SEC-RFPA-WFB-E-0006003	X		None.
P-338	x8487 Wells Fargo Wire Full Transaction Report Aug. 10, 2018	SEC-RFPA-WFB-E-0006045	X		None.
P-339	x8487 Wells Fargo Statements May 2015 to July 2020	SEC-RFPA-WFB-E-0003095 - 3270		X	None.
P-340	x8487 Wells Fargo Statements July 2020 to Feb. 2021	SEC-RFPA-WFB-E-0005022 - 37		X	None.
P-341	x8487 Wells Fargo Statements May 2021 to Aug. 2021	SEC-CORR-E-0000209 - 221		X	None.
P-342	x8487 Wells Fargo Deposits May 2015 to July 2020	SEC-RFPA-WFB-E-0001928 - 35		X	None.
P-343	x8487 Wells Fargo Wires	SEC-RFPA-WFB-E-0005965 - 6086		X	None.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-344	x5571 Wells Fargo Deposits Feb. 2019 to Feb. 2021	SEC-RFPA-WFB-E-0005185 - 212		X	None.
P-345	Abramson Declaration Sept. 7, 2022	SEC-SEC-E-00002717 - 20		X	None.
P-346	Thompson Declaration Sept. 15, 2022	SEC-SEC-E-0002508		X	Hearsay; conclusory; lack of foundation; assumes facts not in evidence; Rule 702; improper legal conclusion; Rule 403.
P-347	Tax Year 2015 Abramson Engagement Letter Jan. 22, 2016	SEC-SEC-E-0002702 - 05	X		None.
P-348	Kane Declaration Sept. 23, 2022	SEC-SEC-E-0002906		X	Hearsay; conclusory; lack of foundation; assumes facts not in evidence; Rule 702; improper legal conclusion; Rule 403.
P-349	Donnelly Declaration Oct. 18, 2022	SEC-SEC-E-0002984		X	Hearsay; conclusory; lack of foundation; assumes facts not in evidence; Rule 702; improper legal conclusion; Rule 403.
P-350	deeproot Portal - Investors	SEC-SEC-E-0003162 - 3261		X	Lack of foundation; Rule 403.
P-351	deeproot Portal - Policies Services - Closed Policies	SEC-SEC-E-0003262		X	Lack of foundation; Rule 403.
P-352	deeproot Portal - Policies Services - Open Policies	SEC-SEC-E-0003265		X	Lack of foundation; Rule 403.
P-353	Leon Declaration Sept. 14, 2022	SEC-SEC-E-0002496		X	Hearsay; conclusory; lack of foundation; assumes facts not in evidence; Rule 702; improper legal conclusion; Rule 403.
P-354	Gray Declaration Oct. 9, 2022	SEC-SEC-E-0002959		X	Hearsay; conclusory; lack of foundation; assumes facts not in evidence; Rule 702; improper legal conclusion; Rule 403.
P-355	Saint Mary's Hall Declaration	SEC-SMH-E-0000111		X	None.

P's Ex. Number	Description	Bates Label	Will Offer	May Offer	Defendant's Objections
P-356	Saint Mary's Hall Transaction Records	SEC-SMH-E-0000026 - 52, 55-57, 59	X		None.
P-357	Spradlin Memo to Mueller June 11, 2022	SEC-SpradlinN-E-0000123	X		None.
P-358	Spradlin Resignation Letter July 9, 2020	SEC-SpradlinN-E-0000124	X		None.
P-359	Spradlin Resume	SPRADLIN0001 - 02		X	None.
P-360	x4336 x6407 x7059 USAA Records Feb. 2014 to Feb. 2021	SEC-USAA-E-0000030 - 1027		X	None.

Dated: October 20, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on October 20, 2023, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record will receive an electronic copy via the Court's CM/ECF system.

/s/ Jason M. Davis

Jason M. Davis